



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

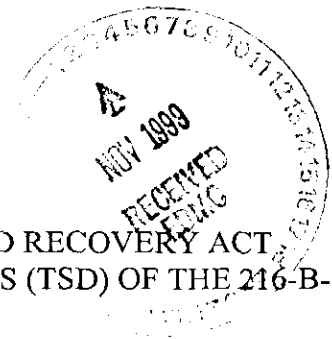
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OCT 13 1989

Mr. E. R. Skinnarland
200 Area Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336-6018

Dear Mr. Skinnarland:

APPROVAL OF QUARTERLY RESOURCE CONSERVATION AND RECOVERY ACT
(RCRA) TREATMENT, STORAGE, AND DISPOSAL INSPECTIONS (TSD) OF THE 216-B-
63 TRENCH



This letter requests approval from the Washington State Department of Ecology to change from weekly to quarterly RCRA TSD inspections at the 216-B-63 trench.

The 216-B-63 trench is an interim status surface impoundment on the Hanford Site. According to 40 Code of Federal Regulations 265-006(a)(2), an interim status hazardous waste surface impoundment (including dikes and vegetation surrounding the dike) must be inspected at least once a week to detect any leaks, deterioration, or failures in the impoundment.

The 216-B-63 was required to cease receipt of hazardous waste by November 9, 1988, and begin closure. These requirements have been met and the closure time frame has been established by the Hanford Federal Facility Agreement and Consent Order compliance schedule. Weekly dike inspections at a surface impoundment are intended to minimize the possibility of dike failure. Such concerns are pertinent during the operational phase, but not during the closure phase after all liquid waste discharges have ceased and no liquid waste remains in the unit. In addition, the 216-B-63 trench has been backfilled and stabilized.

We believe the quarterly surveillance frequency in place at the 216-B-63 trench provides adequate protection in lieu of a weekly inspection given the non-operational status of the unit and intent of the regulatory provision.

Mr. E. R. Skinnarland

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We request your approval of this strategy. If you have any questions regarding this matter, please contact me at (509) 372-0649.

Sincerely,

A handwritten signature in black ink, appearing to read "T. W. Ferns". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

T. W. Ferns, Project Manager
Environmental Restoration Division

ERD:TWF

cc: C. J. Kemp, BHI
J. J. McGuire, BHI
T. A. Wooley, Ecology